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Attorneys for Healthcare Conglomerate Associates, LLC  
and Vi Healthcare Finance, Inc.

**UNITED STATES BANKRUPTCY COURT**  
**EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION**

In re:

SOUTHERN INYO HEALTHCARE  
DISTRICT,

Chapter 9 Debtor.

SOUTHERN INYO HEALTHCARE  
DISTRICT, plaintiff

v.

HEALTHCARE CONGLOMERATE  
ASSOCIATES, LLC; VI HEALTHCARE  
FINANCE, INC.; and DOES 1 through 10,  
defendants.

Bankruptcy Case No.: 16-10015-A-9  
Chapter 9

Adv. Case No.: 18-01031-A

**JOINT STATUS CONFERENCE STATEMENT AND REPORT OF PARTIES'**  
**DISCOVERY CONFERENCE**

Healthcare Conglomerate Associates, LLC ("HCCA"), Vi Healthcare Finance, Inc. ("Vi")  
(collectively, "Defendants") and Southern Inyo Healthcare District ("Plaintiff") respectfully  
submit this Joint Status Conference Statement and Report of Parties' Discovery Conference.

Defendants were served with a reissued summons and the Plaintiff's complaint on or  
around May 30, 2018. Defendants served and filed their answer to the complaint on June 29,  
2018. No discovery has been conducted.

1 Defendants and Plaintiff, by and through counsel, held a Discovery Conference on July  
2 11, 2018, under FRCP 26(f), as made applicable by FRBP 7026.

3 The parties considered the nature and basis of their claims and defenses and the possibility  
4 of early settlement. While settlement was not reached, the parties believe that early mediation  
5 might be conducive to settlement and would avoid costly and lengthy litigation in this matter.

6 The following scheduling dates were agreed to by counsel:

- 7 1. By July 30, 2018, the parties will exchange initial disclosures under FRCP 26(a),  
8 made applicable herein by FRBP 7026, if they have not done so previously.
- 9 2. The parties shall have through December 31, 2018, to complete written discovery.
- 10 3. The parties shall complete depositions by January 31, 2019 for all fact and identified  
11 expert witnesses. The deposition date for deposing an identified expert witness may  
12 be later than January 31, 2019, in the event that the identity of the expert witness is not  
13 disclosed earlier than December 31, 2018. In such event the date for deposing an  
14 identified expert witness shall be 30 days after the identity of the expert is disclosed.
- 15 4. The parties shall have through October 31, 2018 to file amendments to the pleadings.
- 16 5. The parties shall identify any expert witness by December 31, 2018.
- 17 6. The parties shall complete discovery by January 31, 2019, except for certain expert  
18 witness depositions which may be completed after January 31, 2019 as provided in  
19 paragraph 3 above.
- 20 7. The parties shall file dispositive motions by February 28, 2019.
- 21 8. The parties request that the Court set a final pre-trial conference 60 days after  
22 February 28, 2019, or at the Court's convenience at a later time, for the purpose of  
23 setting a trial date.

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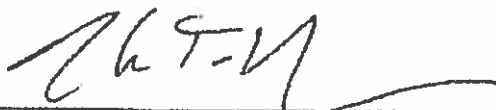
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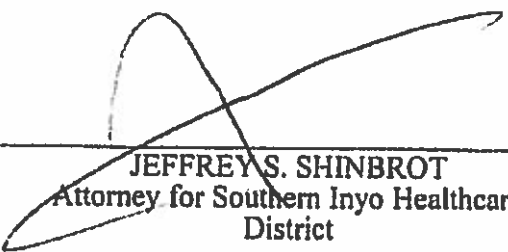
Dated: July 17, 2018

KLEIN, DENATALE, GOLDNER, COOPER,  
ROSENLIB & KIMBALL LLP

By:   
HAGOP T. BEDOYAN  
Attorneys for Healthcare Conglomerate  
Associates, LLC & Vi Healthcare Finance,  
Inc.

Dated: July 19, 2018

JEFFREY S. SHINBROT, APLC

By:   
JEFFREY S. SHINBROT  
Attorney for Southern Inyo Healthcare  
District